

Before the
UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Ida Post Office
Ida, Arkansas

Docket No. A2011-48

COMMENTS OF THE PUBLIC REPRESENTATIVE

(November 23, 2011)

I. SUMMMARY OF PROCEEDINGS

The Commission received an appeal for review of the closing of the Ida, Arkansas Post Office. The petition which was filed by Earlene Cannon on behalf of the Committee to Save the Ida Post Office (Petitioner) is postmarked August 9, 2011 and was posted on the Commission's website on August 17, 2011.¹ In Order No. 801 the Commission instituted a proceeding under 39 U.S.C. 404(d)(5), designated the case as Docket No. A2011-48 to consider the Petitioner's appeal and designated the undersigned as Public Representative.²

The Petitioner raises the following issues: because of alleged factual errors in the record the Postal Service failed to consider whether or not it will continue to provide a maximum degree of effective and regular postal services to the community. See 39

¹ Petition Received from Earlene Cannon on behalf of the Committee to Save the Ida Post Office, August 17, 2011, (Petition).

² Notice and Order Accepting Appeal and Establishing Procedural Schedule, August 18, 2011 (Order No. 813).

U.S.C. 404(d)(2)(A)(iii) and the Postal Service failed to consider the effect of the closing on the Ida community. See 39 U.S.C. 404(d)(2)(A)(i).

The Commission's Notice designated September 1, 2011, as the date for the Postal Service to file the administrative record. On September 1, 2011, the Postal Service filed an electronic copy of the administrative record in response to Order No. 813.³ On October 5, 2011 the Postal Service filed notice of specific pages left out of the original filing.⁴ The Commission's Notice also set forth the date for the Petitioner's filing of a brief or supplemental response. The Petitioner's response was due on September 15, 2011. The Petitioner filed the Participant Statement on September 16, 2011.⁵ Comments were filed by the Postal Service on October 5, 2011.⁶ In its Comments the Postal Service states that the Petitioner raises the issue that the Postal Service failed to consider the whether or not it will be able to provide a maximum degree of effective and regular postal services to the community. Postal Service Comments at 1.

II. DISCUSSION

The Petitioner asserts that the Postal Service record includes factual errors regarding the closing including: (1) rural route carrier is a benefit to the Ida patrons, (2) senior citizens and disabled persons will not be inconvenienced by rural service, (3) the location of the proposed rural boxes along a busy highway has been considered by the Postal Service, and will not result in mail inaccessibility, (4) the questionnaire results, revenue figures and records of active businesses are inaccurate, (5) the Final Determination did not include responses to concerns raised and (6) economic

³ United States Postal Service Notice of Filing, August 26, 2011 (Administrative Record).

⁴ United States Postal Service Notice of Filing, October 5, 2011 (Addition to Administrative Record).

⁵ Participant Statement from Betty Bunch Regarding the Sublime, Texas Post Office, October 5, 2011 (Participant Statement).

⁶ United States Postal Service Comments Regarding Appeal, October 5, 2011 (Postal Service Comments).

considerations are not the reason for the closing of the facility. Participant Statement at 2-4.

The Petitioner raises the issues but did not file much information to validate her view that the record is inaccurate. The Postal Service record summarizes issues raised by the patrons of the Ida post office including many of the Petitioner's claims. Administrative Record Item No. 33. The administrative record includes responses to the issues raised by the Petitioner. The Petitioner's claim is that the record is inaccurate. However, for most of the Petitioner's arguments e.g., rural carrier delivery makes postal service inaccessible to segments of the Ida community, location of boxes are unsafe, inaccurate calculation of the distance of the alternate post office from the community and inaccuracy in the viable businesses in the community the record indicates that the Postal Service does provide a response. The Petitioner does not prove that the record is inaccurate. The arguments raised are similar to those raised in almost every case appealing the closing of a rural or small post office. Unfortunately, the Postal Service response is also a "boilerplate" or one size fits all" response. The responses of the Postal Service may not be personalized to the issues presented but they demonstrate that the issues were considered. There are certainly better responses that could be developed to demonstrate that the Postal Service has actually examined the particular issue presented but that did not occur in this case. The law only requires that the Postal Service take the issues under consideration, not provide the most informative response possible.

The record also contains "Optional Comment Forms" completed by the Petitioner as well as further explanations of patron objections to the closure of the Ida post office and alleged errors in the proposal to close the office. Administrative Record Item No. 38 at 21B. These issues include the distance from Ida to the Heber Springs post office, computation of revenue and expenses and the number of businesses in the Ida

community. *Id.*, Enclosure B.⁷ Again, these issues are raised several times and the patrons nor the petitioner support their viewpoint with any documentation.

One issue that the public representative can address is the distance from the Ida post office to the Heber Springs office. The Heber Springs post office will provide administrative supervision for the rural route carrier delivery service for the Ida Community. The Postal Service states that the Heber Springs Post Office is located six miles away. Administrative Record Item Number 33 at 2. The Petitioner indicates that the Heber Springs post office is 9.4 miles. Petition at 1. The Public Representative did a search using “Bing” and the results indicate the distance is 7.9 miles. There may be some dispute on the actual mileage to the office but regardless of the exact mileage the intent of providing actual rural route carrier service is that trips to the post office facility should be reduced. Additionally the record indicates that the closest post office is Tumbling Shoals post office, an EAS-13 level office, that is four miles away. Final Determination at 2, Item No. 4. The Postal Service indicates that this facility also has post office boxes available for use and retail services can be obtained from this office. *Id.*

Clearly, a number of concerns are duplicative and in almost all instances the Postal Service has considered the issue and provided a response. If the responses in this instance are personalized to address the specific community concerns even if the issue is national in scope, it would be helpful. However, in the public representative’s view the Postal Service has considered community concerns and responded to them meeting the requirements of 39 U.S.C. 404(d)(2)(A)(i).

Regular and effective postal services. The Postal Service’s administrative record provides background on the Ida post office. Final Determination at 2. The Ida post office alternate service will be provided by the Heber Springs post office, an EAS-20 level office with 332 available post office boxes. Administrative record at 2, Item No.18. As stated above, retail service is also available 4 miles away at the Tumbling Shoals

⁷ There are multiple duplications of the same issues included in the comment forms from other patrons contained in the record.

post office. Questionnaires to postal patrons were distributed and returned. The patrons' responses indicate that a majority of them leave the Ida community to go to surrounding communities for employment, shopping and other reasons. Many of the patrons go to Heber Springs for these purposes.

In the event that customers need support for hardship cases or special customer needs, a request should be made to the administrative postmaster for more information. Patrons should exercise this option as necessary. The administrative record provides the names of Postal Service representatives to contact in the event the outcome is unsatisfactory.

The record contains the results of questionnaires and responses from the Postal Service, community meetings and responses to issues raised that demonstrate that the Postal Service considered the community's concerns about the consolidation's effect on postal services. Based on a review of the administrative record and petitioner's concerns it appears that the postal service can provide regular and effective postal services with the alternate rural route carrier service and administrative oversight by the Heber Springs post office. It has complied with 39 U.S.C. 404(d)(2)(A)(iii)).

Economic savings. The Public Representative's view is that some additional administrative expenses may result from closing but in general the Postal Service does not provide the costs associated with post office consolidation, closure or other changes in sufficient detail. The Postal Service should accurately reflect this information and explain how its actual savings forecast are made.

Respectfully Submitted,
/s/ Cassandra L. Hicks
Public Representative

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